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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-429

13 **CRAIG LEBERN JACKSON**
915 Shorepoint Court, #E309
Alameda, CA 94501

A C C U S A T I O N

14 **Registered Nurse License No. 755589**

15 Respondent.

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17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs.

22 2. On or about July 20, 2009, the Board of Registered Nursing issued Registered Nurse
23 License Number 755589 to Craig Lebern Jackson (Respondent). The Registered Nurse License
24 was in full force and effect at all times relevant to the charges brought in this Accusation and will
25 expire on January 31, 2015, unless renewed.

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1 **COST RECOVERY**

2 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
7 included in a stipulated settlement.

8 **FACTS**

9 10. On or about July 23, 2011, Patient A¹ was admitted to Santa Clara Valley Medical
10 Center (SCVMC) after a suicide attempt. Respondent was employed at SCVMC as a per diem
11 registered nurse in the Acute Psychiatric Services unit and assigned to care for Patient A.
12 Respondent admitted that he obtained Patient A's telephone number and birthdate, and
13 telephoned and texted Patient A, approximately four to six times, after she was discharged.

14 On or about August 25, 2011, Patient A was admitted to SCVMC for a Welfare and
15 Institutions Code section 5150 (24-hour hold) for psychiatric evaluation. Patient A informed the
16 Director of Nursing that she wanted to be discharged because she was "uncomfortable" at the
17 thought of seeing Respondent because he had telephoned and texted her several times.
18 Respondent admitted that he was aware that contacting a patient in the way he did was against
19 SCVMC policy. Respondent was terminated on August 25, 2011.

20 **CAUSE FOR DISCIPLINE**

21 **(Gross Negligence)**

22 11. Respondent has subjected his license to disciplinary action under Code section 2761,
23 subdivision (a)(1) on the grounds of gross negligence, in that on or between July 23, 2011 and
24 August 25, 2011, while employed as a registered (psychiatric) nurse in the Acute Psychiatric
25 Services unit, Respondent obtained Patient A's telephoned number and birthdate and telephoned
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27 _____
28 ¹ The patient's name will be released to Respondent pursuant to a request for discovery.

1 and texted Patient A approximately four to six times, after she was discharged. Respondent failed
2 to follow hospital policy and procedures regarding "professional behavior" with patients.


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4 **PRAYER**

5 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this
6 Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

7 1. Revoking or suspending Registered Nurse License Number 755589, issued to Craig
8 Lebern Jackson

9 2. Ordering Craig Lebern Jackson to pay the Board of Registered Nursing the
10 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
11 Professions Code section 125.3;

12 3. Taking such other and further action as deemed necessary and proper.

13 DATED: November 27, 2012 
14 for LOUISE R. BAILEY, M.ED., RN
15 Executive Officer
16 Board of Registered Nursing
17 Department of Consumer Affairs
18 State of California
19 Complainant

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